

State Water Resources Control Board

November 3, 2015

Shell Oil Products Company, US
Attention: Ms. Andrea Wing
20945 South Wilmington Avenue
Carson, CA 90810
[Via email only] (Andrea.Wing@shell.com)

Dear Ms. Wing:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE,
SHELL SERVICE STATION, 4404 SOUTH WESTERN AVENUE, LOS ANGELES,
LOS ANGELES COUNTY

State Water Resources Control Board (State Water Board) Resolution No. 2012-0062 requires that State Water Board staff review a lead agency's decision when the lead agency has denied a request by a responsible party for an underground storage tank (UST) case closure pursuant to the Low-Threat UST Case Closure Policy (Policy).

The subject case has the following identification numbers:

- State Water Board, GeoTracker No. T0603709847
- Los Angeles Regional Water Quality Control Board (Los Angeles Water Board), Case No. 900470052A

State Water Board staff reviewed the closure request dated November 21, 2014 and the response from the Los Angeles Water Board. After careful consideration of the GeoTracker record, State Water Board staff agrees with the Los Angeles Water Board staff determination that all of the Policy criteria have not been met. Based on information in the above-referenced GeoTracker record, this agency finds that the subject case does not meet the following Policy criteria:

- **General Criterion d.** – Free product has been removed to the maximum extent practicable.
- **General Criterion e.** – A conceptual site model that assesses the nature, extent, and mobility of the release has been developed.
- **Groundwater Media-Specific Criteria** – Free product has been removed to the maximum extent practicable.

There is a significant amount of petroleum in soil and groundwater beneath the site. During the April 2015 groundwater monitoring event, free product was present in monitoring wells BH-1A and BH-4A at thicknesses of 0.22 feet and 0.21 feet, respectively. Furthermore, monitoring well

MW-6A contained free product at a thickness of 0.02 feet in April 2014, before groundwater levels dropped below the total depth of the well. Free product measurements in this well were not possible during subsequent monitoring events.

Contaminants remaining at the subject site continue to pose a potential threat to human health, safety, and the environment. Criteria for low-threat UST case closure have not been met at this time, therefore closure of the UST case is not appropriate.

If you have any questions, please contact George Lockwood at (916) 341-5752 or George.Lockwood@waterboards.ca.gov.

Sincerely,



Victoria A. Whitney, Deputy Director
Division of Water Quality

cc: Mr. Jafar Rashid
4404 South Western Avenue
Los Angeles, CA 90047

Mr. Eric Ehlers
Conestoga-Rovers & Associates
175 Technology Drive, Suite 200
Irvine, CA 92618

[Via email only]

Mr. Samuel Unger, Executive Officer
Los Angeles Water Board
(Samuel.Unger@waterboards.ca.gov)

Ms. Paula Rasmussen
Los Angeles Water Board
(Paula.Rasmussen@waterboards.ca.gov)

Mr. Yue Rong
Los Angeles Water Board
(Yue.Rong@waterboards.ca.gov)

Mr. Weixing Tong
Los Angeles Water Board
(Weixing.Tong@waterboards.ca.gov)

Ms. Chandra Tyler
Los Angeles Water Board
(Chandra.Tyler@waterboards.ca.gov)

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Ms. Frances McChesney
State Water Board
(Frances.McChesney@waterboards.ca.gov)

Ms. Jennifer Fordyce
State Water Board
(Jennifer.Fordyce@waterboards.ca.gov)

Mr. David P. Coupe
State Water Board
(David.Coupe@waterboards.ca.gov)

Ms. Therese Barakatt
State Water Board
(Therese.Barakatt@waterboards.ca.gov)

Mr. George Lockwood
State Water Board
(George.Lockwood@waterboards.ca.gov)

Mr. John Huff
Wayne Perry, Inc.
(John.Huff@wpinc.com)

Ms. Sara Heikkila
Conestoga-Rovers & Associates
175 Technology Drive, Suite 200
Irvine, CA 92618
(Sara.Heikkila@GHD.com)